

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC,

Plaintiff,

v.

ISLAND PROJECT AND OPERATING SERVICES,
LLC; VITOL US HOLDING II CO.; VITOL VIRGIN
ISLANDS CORP.; ANDREW CANNING; and OPTIS
EUROPE, LTD.,

Defendants.

CIVIL NO. 1:21-CV-00312

**VITOL DEFENDANTS' (UNCONTESTED) MOTION FOR ADMISSION
PRO HAC VICE OF MICHAEL CRAIG KELSO, ESQ.**

Defendants Vitol Virgin Islands Corp. and Vitol US Holding Co. (collectively, the “Vitol Defendants”), by and through undersigned counsel, hereby move this court for admission *pro hac vice* of Michael Craig Kelso, Esq. in the above captioned matter. As grounds therefore:

1. Pursuant to LRCi. 7.1(f) Vitol Defendants have advised all counsel of this motion and there is no objection by any party to the admission requested.
2. Attorney Kelso is an attorney with the law firm Susman Godfrey, LLP, 1000 Louisiana Street, Suite 5100, Houston, Texas, Telephone No. (713) 651-9366, Email: mkelso@susmangodfrey.com. He has been admitted to practice law in Texas since 2014. A copy of the *Pro Hac Vice* Application of Attorney kelso is attached hereto as Exhibit A.
3. Attorney Kelso is a member in good standing of the Texas bar and has not suffered any disbarment or suspension of his license to practice. His Certificate of Good Standing is attached hereto as Exhibit B.

4. The Declaration of Michael Craig Kelso, Esq. in Support of Motion for Admission *Pro Hac Vice* is attached as Exhibit C.
5. The Vitol Defendants have requested that Michael Craig Kelso, Esq. participate fully in the preparation and trial of this case.
6. As local counsel for the Vitol Defendants, I hereby recommend the admission *pro hac vice* of Michael Craig Kelso, Esq. See Declaration attached hereto as Exhibit D.

Respectfully submitted,

Beckstedt & Kuczynski LLP

Attorneys for Vitol Defendants

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DATED: May 25, 2023

By: s/ Carl A. Beckstedt III
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